

Summary

Transition Bath welcomes the opportunity to respond to Bath & North East Somerset Council's draft [MOD Concept Statements](#) published for public consultation between 18th April and 30th May 2012. They concern the redevelopment of MOD sites at Ensleigh, Foxhill and Warminster Road in Bath and propose the development of 1200 houses, 2 Primary Schools, a Doctor's Surgery and associated infrastructure across the three sites. The sites are seen by the Council as key to providing new housing and form a crucial part of its Core Strategy for brownfield development. The Council's Strategic Housing Land Availability Assessment predicts they should provide around 20% of Bath's housing requirement for the period up to 2026. We understand the purpose of the statements is to guide the redevelopment and disposal process with reference to agreed high-level, design principles. We also understand that the MOD will market the sites from September 2012 and that the pressure of time has prevented the Council from preparing a formal Development Plan Document.

The following points summarise our key comments and observations:

1 Planning and consultation process

- The absence of a full 'Development Plan Document' is regrettable and an opportunity missed. We are concerned that the haste to assist the MoD's site disposal process may put at risk some interests of the local community.
- The MoD's dual need to dispose of the Ensleigh site quickly while at the same time as hold onto its Data facility there until 2018 may put into conflict the operation and delivery of the development and construction process.

2 Energy

- All domestic buildings should be designed and constructed to the highest standards of environmental and energy performance e.g. Code for Sustainable Housing 6 at the Ensleigh & Foxhill sites and Codes 5 & 6 at Warminster Road.
- There is a unique opportunity for developers of the sites to link up with Bath West & Community Energy the UK's largest local community renewable energy enterprise to finance and run renewable energy schemes across these sites.

3 Sustainable design, construction, commissioning and space use

- Non-domestic buildings including the schools should be built to BREEAM standard 'Excellent'.
- High standards must be set to support sustainable floor space and noise insulation for all domestic properties. We strongly recommend the adoption by the Council of the aims of the RIBA's 'Case for Space' to assist with the long term usefulness of the new homes.

- Homeworking requires fast, reliable broadband services. These developments offer an excellent opportunity for the Council and its stakeholders to approach the telecommunications sector and improve the city's broadband performance.

4 Community and food

- Shops and cafes should be included at all sites and for them to be community or at least locally owned, with food locally sourced.
- Guidance should be given on where community facilities are located within the sites.
- Allotments should be integrated with houses to help foster community interaction.
- Site layout principles that help foster community awareness and interaction should be encouraged. More visibly open, movement-permeable layouts allowing the sharing of space between traffic and pedestrians are more successful than dead ends and cul-de-sacs in creating well-integrated neighbourhoods.

5 Transport

- Careful thought needs to be put into car parking arrangements but with residents encouraged to use low-energy transport e.g walking, cycling, buses and car clubs. Carefully balanced provision for private parking should encourage residents to use lower carbon alternatives.
- Low cost, frequent public transport is key to the success of linking these sites to the city.

6 Local economy

- At least 20% of the dwellings should be constructed by local builders and self-developers with half of all properties designed by local design professionals e.g. architects, engineers and surveyors, commissioned through a community centred design competition. This will encourage investment in the local economy while improving skillsets in low-carbon housing among local tradespeople while fostering community engagement with the projects.
- We would also request the council to encourage developers to make generous use of the talents of local architects and designers. A design competition with the involvement of the local community could add to the success of the schemes.
- Opportunities for more direct community involvement are possible. For example, through facilitating a proportion of co-housing.

Transition Bath

Transition Bath is a local environmental organisation with around 1,000 supporters. Its aim is to help build a sustainable future by harnessing the power of community in the face of declining natural resources and increasing fuel and food costs. We support moving to a low carbon, local economy and building positive, self-reliant communities. We are involved in a wide range of local activities including the recent Bath Homes Fit for the Future project in partnership with BANES Council and Bath Preservation Trust.

In 2009 the council formally endorsed the Transition Movement, in particular agreeing to *“consider through the Council's strategic planning ways in which the Council may assist in achieving the goals of the Transition Towns and Villages and the resource implications of doing so.”*

Bath's challenges

The Bath & North East Somerset region faces an unusual challenge, and one that is locked into its future development: to address the large proportion of energy inefficient heritage buildings within its housing stock, along with a rapidly ageing residential population and a worryingly high proportion of winter deaths. This situation demands a carefully designed response and recent events suggests some progress is now starting to be made.

Bath is responding to this and other environmental challenges through positive local action and particularly in the area of sustainability. This includes six successful DECC LEAF bids; the Energy Efficient Widcombe Project; the award winning Warmer Bath project offering guidance to energy efficiency in traditional homes; and the launch of Bath & West Community Energy, now the largest community energy share issue in the UK. In addition to these recent successes are the long-standing and popular Green Park Farmer's Market, several community fruit and vegetable gardening schemes, the FareShare food initiative, the Bath Oliver local currency scheme and the Chelsea Road walk to shops initiative.

Other challenges the region shares nationwide and in response to Government policy have a statutory obligation. In particular, the UK is committed to reducing its greenhouse gas emissions by at least 80% by 2050, relative to 1990 levels. The Council is also committed to reducing the area's carbon emissions by 45% between 1990 and 2026. This means all future development of the area's housing stock - from retrofit to new build, will need to start from the recognition that some 41% of the areas carbon emissions arise from residential energy use.

1 Planning and consultation process

A full 'Development Plan Document' has not been offered for public consultation. We believe this is an opportunity missed as it may have ensured instant weight and authority to the Council's influence over the development process immediately from its first inception. It is not clear what authority beyond simple guidance the Concept Statements will carry during this initial stage of the planning process. We are concerned that the haste to assist the MoD's site disposal process may put at risk some interests of the local community.

The MoD's dual need to dispose of the Ensleigh site quickly while at the same time as hold onto its Data facility there until 2018 appear at odds. We are concerned that this will put into conflict the smooth running of the development and construction process at Ensleigh and fear that traffic access, site insurance, infrastructure development and project completion may be negatively impacted.

2 Energy

Energy conservation standards

All buildings should be designed and constructed to the highest standards of environmental and energy performance e.g. Code for Sustainable Housing Level 6 at the Ensleigh & Foxhill sites and Codes 5 & 6 at Warminster Road.

The Concept Statements suggest a Code for Sustainable Housing Level 4 at all the sites with a 'few' demonstration Level 5 & Level 6 properties. Code level 4 is only equivalent to the new Part L of the Building Regulations as required in 2013 and setting the standard this low would be an opportunity lost. We would recommend this be upgraded in the final document to specify Level 6 at Ensleigh & Foxhill, and a minimum of Level 5 at Warminster Road with the use of "Allowable Solutions" minimised.

There are a number of reasons behind our request for higher standards:

- a. **Long construction period encompassing higher standards:** the construction of these sites is likely to take place over a long period of time. For example, based on progress at Riverside this could be up to ten years. Once Planning Application and Building Regulation consent is given at the beginning of the project the properties are legally allowed to be built to that standard for the remainder of the development. A worst case scenario would be that properties built in 2022 would only need to meet the Building Regulation standard of the initial planning application as submitted some ten years earlier. We believe a higher standard should be required that would exceed the potential Building Regulations at the midpoint in the construction i.e. around 2017. This is likely be Code Level 5 & 6 as currently being proposed for 2016 Building Regulations.
- b. **Impact of land value & building premiums - less significant in near future:** delivering properties to the highest standard generally costs more. If this can't be reflected in the sale value of the

new properties this may reduce the land value and any return the MOD might make from selling the sites. We believe this potential reduction in land value would be minimal and meeting a higher standard would be in the interests of the community, something that the MOD is mandated to take into account when selling the land. Historical analysis of these costs suggests building to Code 5 & 6 is likely to increase building costs by between 5% and 30%¹ compared with a property built to Code 4. This has been used by the Building Industry to argue against compliance with these higher standards. However the costs are reducing rapidly as the volume of buildings built to these standards increase and the costs of renewables required to make properties more carbon neutral, for example solar panels, are also dropping rapidly². More recent analysis for example from Zero Carbon Hub suggests that by 2017 the added premiums will have halved to between £3000 and £8000³. We believe the council's supporting document⁴ to the Concept Statement which assessed the cost impacts by using higher standards, ought to have looked at these reducing future costs rather than basing them on 2010/2011⁵ costs.

- c. **Need for Bath to meet the UK Government's 2050 80% CO2 reduction commitment:** The UK Government has committed to reducing the UK's carbon emissions by 80% by 2050. This is a core issue for Transition Bath. In order to meet this commitment new homes will have to become carbon neutral to compensate for other sectors for example aviation, plastics and agriculture where it is much more difficult to reduce emissions to zero. The Bath area is going to struggle to meet this commitment because of the prevalence of listed Georgian properties. We predict that new developments in Bath may be forced to compensate for the older building stock and as a minimum will have to be built to carbon-neutral or even carbon positive standards.
- d. **Retrofitting to a higher standard is expensive:** once a property is built to a lower standard it is much more expensive to then have to upgrade it to a higher standard. We believe this cost is several multiples of the original cost. The usable floor areas of properties are often reduced if for example internal wall insulation is installed during a retrofit. In the medium to long term it may be more efficient and economic to develop to the higher standards to avoid significant additional expense of having to retrofit the property to meet 2050 standards.
- e. **"Allowable Solutions" should not be allowed:** this approach may allow developers to avoid meeting future carbon neutral building regulations by making offset payments, similar to carbon offset payments on airline flights. Developers are concerned with the extra costs to meet the new standards and argue it would be cheaper to invest in alternative carbon reduction schemes outside their developments. Typically this could reduce cost premiums by 70%. We believe this is short-sighted because in the long-term the overall cost is likely to be far greater because of the need for retrofitting. Meanwhile the costs of making a building near carbon neutral are rapidly reducing.

¹ "[Code for Sustainable Homes: A Cost Review](#)", Dept Communities & Local Government, March 2010

² The [price](#) of solar panels dropped by 50% in 2011.

³ "[Zero Carbon Homes: Impact Assessment](#)" Dept. Communities & Local Government, May 2012 [P13 – suggests cost premiums will halve down to between £3000 & £8000 with higher volumes by 2017

⁴ "[Setting Energy and Sustainability standards for three MOD sites in Bath](#)" AECOM, February 2012

⁵ "[Costs of building to the Cost of Sustainable Homes: Updated cost review](#)", Dept. Communities & Local Government, August 2011

- f. **Other councils are specifying Codes 5 & 6 for other MOD site disposals:** The requirement for Code 4 is weaker we note, than demands from other councils working in partnership with the MoD on land disposals, for example:
- i. For the MOD Whitehill Bordon redevelopment, East Hants Council are specifying⁶ all the houses are to be built to Code 6 standard: *“All of them will be built to the Code for Sustainable Homes level 6”*
 - ii. For the redevelopment of Devonport, Plymouth Council has required⁷ that the majority of the housing should be Code 6.

Given the wide support for sustainability concerns across Bath, matching if not exceeding the standards being set at other locations is an imperative. In the examples above their documents have either ‘Core Strategy’ or ‘Local Development Framework’ status and so provide more stringent guidance than those of BANES. We recommend this issue be addressed with urgency.

- g. **Developers believe Code 6 is unaffordable:** A commonly held view is that it is economically impossible to build to Code 6. While this is a new and demanding standard there are enough precedents to illustrate its feasibility. Examples include:
- i. [Parkdale in Castleford](#) – where 91 houses have been built;
 - ii. [Mendip Road, Chelmsford](#) – where 10 houses have been built;
 - iii. [Greenwatt Way, Slough](#) – SSE showcase code 6 development.

An example of Code 5 commercial housing built close to home is the Darlington Wharf development adjacent to the Warminster Road site, recently completed by Emery Brothers Ltd. This is shown in the photo below:



⁶ [“Core Strategy Preferred Policies - Whitehill Bordon”](#) – East Hants Council

⁷ Chapter 5 Plymouth Council [Local Development Framework: Improving Housing](#)

This new-build terrace faced in local stone is designed to meet Code 5!

Renewables

Building houses to CfSH Codes 5 & 6 requires the use of renewables, typically solar PV, solar thermal and biomass heating. A unique opportunity arises here for co-investment by Bath West & Community Energy (B&WCE) the UK's largest local community renewable energy enterprise. This includes the potential to supply and finance solar roof panels and district-wide biomass heating, potentially offsetting some of the developer's costs in meeting CfSH Codes 5 & 6. For whole neighbourhood heating and electricity a CHP solution could also be considered.

We would also recommend careful design consideration is made in the control of heating and ventilation to these properties. A number of post installation assessments of mechanical ventilation and heat recovery systems, solar thermal⁸ and air source heat pumps⁹ have suggested residents don't clearly understand the system controls. As a result the predicted energy efficiency savings from such systems have not been achieved. Community based support for new residents would help improve the understanding of controls, and help ensure that heating and ventilation systems are used more efficiently. Alternatively the schemes could be supported by a 'Soft Landings' commissioning framework¹⁰ to help occupiers understand how to best control and use their new homes.

It could be of immense benefit to the Bath community if the implementation of site wide energy monitoring and control systems is combined with research taking place at Bath University into Smart domestic building control systems¹¹.

3 Sustainable design, construction, commissioning and space use

Landscaping

Notwithstanding the requirement to build to BREEAM environmental standards, the landscaping solutions will require very careful consideration of climate change impacts e.g. low-water planting, use of sunlight reflecting surface materials and the avoidance of tarmac surfaces. With more dramatic weather patterns predicted, careful thought will be needed into designing how people move across these sites with regards to sun and rain, planting, personal security, night-time lighting and associated light pollution. UK rainfall patterns are causing problems with sudden high volumes of rainwater run-off that deluge city storm drains. Landscaped surfaces that are more porous, green roofs and walls that hold and release water slowly and water butts to help store rainwater for later use will all help mitigate some of the worst effects.

⁸ ["Here comes the sun: a field trial of solar water heating systems"](#), Energy Saving Trust, Sept 2011

⁹ ["Getting warmer: a field trial of heat pumps"](#), Energy Saving Trust, Sept 2010

¹⁰ <http://www.bsria.co.uk/services/design/soft-landings/>

¹¹ ["Enliten"](#) – a £1.5M project to look at Smart who occupants use energy control systems & whether these can be improved (2012-2016)

Non-domestic buildings

We recommend that all non-domestic buildings on the three sites be built to BREEAM 'Excellent' standard, and ideally target 15 credits under 'Ene 01', meaning the buildings are carbon neutral. Transition Bath has highly valued experience¹² in working closely with schools to reduce energy consumption. Based on this experience we know that once a school is built its fabric is rarely upgraded, mainly because of the intermittent nature of school capital funding. The record clearly shows many Bath Schools built in the 1950s and 1960s have had no such upgrades. Any new school needs to be built to the highest standard from the start as it is unlikely to be retrofitted to a higher standard later and therefore unable to meet the 2050 80% CO2 reduction target.

In tandem with the construction of new buildings a Soft Landings¹³ commissioning framework to help occupiers understand how to best control and use their new buildings is recommended. A Soft Landings' approach means designers and constructors stay involved with buildings beyond their practical completion. This assists the client during the first months of operation and beyond, to help fine-tune and de-bug the systems, while ensuring occupiers better understand how to control and use their buildings.

Space standards

BANES council has no floor-area space standards for new dwellings. As a result developers are building properties in Bath which we believe are too small and may not be sustainable in the long term. There are a number of problems with building properties that prove to be too small:

- a. **Transient population rather than a sustainable community:** if properties are too small occupiers won't live in them for long periods and merely see them as a short-term stepping stone to a larger property that they are more comfortable living in. This makes it difficult to maintain a stable community if the population is constantly changing
- b. **You can't predict future requirements:** homes built today could last for generations. It is difficult to predict future domestic use patterns. Dwelling space that allows patterns of use to evolve over time is highly valued. Many in Bath live in Georgian flats not designed for 21st century living (they were built 200 years ago without bathrooms, kitchens, TVs, computers etc.) but they have been successfully adapted because space has allowed it. The average single floor Georgian two-bed flat conversion in Bath is some 80 square meters, which is adequate to allow flexible conversion and future adaptability. New dwellings with insufficient space may not stand the test of time.

Housing development in London is once again guided by 'Parker Morris'¹⁴ type space standards. These Bath developments must deliver houses of a fully functional size, suitable for long-term, sustainable habitation. We strongly recommend the adoption by the Council of the aims of the

¹² [Transition Bath Schools Energy Project & B&WCE DECC LEAF Schools Energy Assessment Project](#)

¹³ www.bsria.co.uk/services/design/soft-landings/

¹⁴ 'Homes for Today and Tomorrow', Parker Morris, HMSO 1961

RIBA's 'Case for Space'¹⁵. The Council should target minimum floor areas of for example 60sqm for two-bed flats and 100sqm for three-bed houses. We would recommend the council incorporate domestic floor-area space standards into its Core Strategy documents.

Homeworking

Trend towards home working: there is an evolving trend to increased home working. We believe that many properties currently being built are unlikely to accommodate adequate space for desk based home working. Homeworking requires not only the opportunity to find space in the home but also reliable broadband services. Bath has a poor reputation in this regard. We see the scale of these developments as offering an excellent negotiating opportunity for the Council and its stakeholders to approach the telecommunications sector and improve the city's broadband performance.

Noise insulation between properties

Along with minimum space standards we think it important that high-quality acoustic insulation be provided between and within properties. Conflict over noise has a significant impact on community welfare. Combined with undersized properties it can lead to high turnover of occupants and general disharmony. We recommend developers pay careful attention to the issue of noise insulation.

4 Community and food

Shops and Cafes: Shops and cafes should be included at all sites. We note this is a significant omission from the current Concept Statements. These facilities should be community or at least locally owned, with food locally sourced and guidance could be given on where community facilities are located within the sites. A good model for such a facility is the community owned shop and café at Freshford.

The availability of local shops will have the benefit of reducing local traffic volumes as residents will not have to travel offsite for some of their shopping needs. Ideally everyone should have a shop for their daily needs within walking distance, a fact borne out by the Transition Bath, Chelsea Road survey. It is difficult to walk up from town carrying bags of shopping, particularly for the elderly and mothers with pushchairs. What must be avoided is for people to have to use a car or take an expensive bus journey simply to buy a pint of milk or a newspaper, let alone some fruit and vegetables. Shops and cafes also act as social meeting places, particularly for the socially isolated e.g. the elderly and young mothers, encouraging a sense of community.

Allotments: We welcome the council's commitment to include allotments on all three sites. Allotments should be integrated with houses to help foster community interaction. The Concept Statements need to encourage developers to place allotments close to housing but not at the expense of cutting down private garden space.

¹⁵ [The Case For Space: The Size of England's New Homes](#)", RIBA, Sept 2011

We note that the allocation of space for allotments is consistent with BANES council's Green Spaces Strategy. At the same time we question whether there is sufficient for these sites and request that contingency plans be put in place should they be over-subscribed. The current space allocation implies about a half plot¹⁶ or 125sqm per 16 households and question whether this is enough. If full plots were allocated this would mean only 1 plot per 32 households. The housing densities of the sites look high, and may not leave much space for gardens. We suspect the allotments will be very popular on these sites. One option would be to set aside some of the allocation of 'formal open space' and 'natural areas' (which currently has ten times the space allocation of the allotments) as possible extensions to the allotments if the initial allocation is insufficient. From our awareness of the popularity of community orchards, a portion of the 'open space'/natural areas' could be allocated for this purpose.

How non-domestic buildings are integrated into the sites: the concept documents provide little guidance about how non-domestic buildings are well integrated into the sites. This may cause problems on the Ensleigh site if the MOD fails to release the space currently occupied by their data centre.

Integration of these sites into the surrounding community: little has been said in the Concept Statement about how these sites can be integrated into adjacent neighbourhoods. It is important that the views of the local community are taken into account in their design and layout.

Site layout principles that help foster community awareness and interaction should be encouraged. Research studies have demonstrated the paucity of community awareness reinforced by feelings of isolation arising from suburban style 'cul-de-sac' planning.¹⁷ More visibly open, movement-permeable layouts and allowing the sharing of space between traffic and pedestrians are proving more successful than cul-de-sacs in creating stable and secure urban neighbourhoods.¹⁸

5 Transport

Transition Bath promotes sustainable transport, with the objective of minimising fossil fuel consumption through encouraging investment in walking, cycling and public transportation. We feel that significant opportunities exist within these sites to promote sustainable transportation.

We feel the first priority should be to minimise the need to travel. This can be achieved by providing local facilities such as shops, cafes, community meeting spaces, workplaces and schools. A second priority, if there is a need to travel offsite would be to make this as sustainable as possible by trying to avoid the need to use gasoline powered vehicles. These not only create atmospheric pollution from dangerous Nitrous Oxides, particulates and greenhouse gas emissions, but contribute to noise

¹⁶ The national standard size for allotment plots is [250 m²](#) – twice B&NES's local standard

¹⁷ See Space-syntax publications UCL 1975 onwards

¹⁸ www.kensington.londoninformer.co.uk/2012/02/exhibition-road-shared-space-o.html

pollution and congestion within town. Transition Bath seeks to encourage walking, cycling and public transportation on these sites and to discourage the use of petrol/diesel driven cars.

More detailed comments on transport is provided in the site specific section at the end of this document as each site has differing transport requirements. More general issues relevant to all these sites are discussed immediately below.

Provision of local facilities: Transition Bath welcomes the inclusion of new primary schools at Ensleigh and Foxhill. As discussed in [Shops and Cafes](#) in more detail, shopping and cafés should be provided at all sites to minimise the need to travel long distances.

Public transport: To encourage use of public transport, it needs to be cheap, convenient and frequent. In particular it needs to be more convenient than using private cars for trips within Bath. Encouraging this requires making bus stops readily accessible to residents and making car parking less accessible. This is likely to be a significant challenge for the Council and other stakeholder agencies to make travel between these sites and the city properly sustainable. Transition Bath supports an imaginative, shared response from all stakeholders.

Using parking arrangements to discourage car usage: We support the statement that *“The layout shall be pedestrian and cycle dominant, with excellent public transport accessibility. A ‘shared space’ ethos for streets and spaces should prevail throughout the site”*, while requesting clearer guidance on parking provision. In particular:

- We feel that the Concept Statements should provide stronger guidance in the provision and placing of car parking to prevent it dominating the street scape while encouraging children to play outside their homes – for example by keeping cars to the outer edges of the sites
- Parking allocation should be at a maximum of 1 vehicle per household at Ensleigh and Foxhill and 0.5 vehicles per household at Warminster Road
- Space should be allocated to ‘Car Club’ parking, to support the need for car ownership and to reduce the necessity for second car ownership
- Ideally car parking space should be paid for both on a capital and operational basis, this would skew the economics of car ownership towards public transport and ‘Car Clubs’¹⁹
- Reducing car parking provision has the additional benefit of making more space available for housing (larger floor areas) and communal spaces – allotments, natural areas
- Provision should be made for charging electric vehicles and high power cabling for when they become more common needs to be carefully considered – power should be available to all parking spaces

¹⁹ [“Car free Development: a guide for developers and planners”](#) discusses examples of how car free developments can be implemented, including Freiburg charging £12,500 for a parking space, plus a monthly fee. There is however a danger of car parking over spilling to the surrounding areas if residents try to avoid the fee

6 Local economy

While the Concept Statements allude to making provision for self-builders they lack specificity. They need to be more specific as to the opportunity afforded to local builders. Any provision for local involvement could be ignored once the land is purchased.

One of Transition Bath's aims is to promote the local economy and we would like to encourage the council to ensure these developments will do the same. In addition to a role for self-builders we suggest that local architects and commercial builders should be given the opportunity to take a lead.

A minimum of around 20% or 240 homes we would suggest could be allocated to local developers and self-builders. This could assist local tradesman gain experience in low-carbon housing which would equip them for future developments elsewhere in the region.

We would also like the council to encourage developers to make generous use of the talents of local architects, engineers and surveyors. A design competition with the involvement of the local community could help ensure the success of the schemes.

Opportunities for direct community involvement are also possible. For example, a co-housing scheme such as the Springhill development in Stroud²⁰ in which a local community group was responsible for the financing, design and build of a group of houses and associated facilities may offer itself as one way forward. Some form of community enterprise in partnership with the development team may be a direction in which the Council sees an important and unique opportunity arising, facilitated through the supporters, contacts and volunteers of Transition Bath.

7 Site Specific Issues

Each of the sites has specific issues that need addressing separately:

7.1 Ensleigh

The Ensleigh site is the most isolated and has few local facilities. We suggest the following be included in the planning statements:

The provision of a local shop, café and community centre: there are no local shopping facilities in Upper Lansdown and the community centre is decrepit and on the periphery of the area.

The provision of a local shop and café would have two key benefits:

- I. To act as a hub for the community and reduce the need for residents to travel offsite, reducing traffic congestion both locally and down into the centre of Bath;

²⁰ <http://www.cohousing.org.uk/node/78>

- II. To provide the current residents of Upper Lansdown with a new facility to help Ensleigh better integrate with its community.

We would encourage BANES council to support locally owned and run businesses and whose provisions are sourced from the local area. Major chains tend not use locally sourced food, an issue the Transition Bath Food Group²¹ is strongly committed to addressing. The region surrounding Bath has excellent local food producers.

A shop and café, with careful design could also be combined with a replacement community hall with the café using the space during the day and the community hall utilising the space in the evenings.

Provision of a primary school: Transition Bath welcomes the provision of a primary school, a facility currently absent from Upper Lansdown. It would reduce the need for residents to travel off site to take their children to school. Provision needs to be made to take pupils from the surrounding catchment area to the school either by walking or using the public bus service.

Public Transport: Of all three sites Ensleigh requires the most careful consideration for supply of public transport. It is the most isolated and has the least current provision.

For public transport to be well utilised it needs to be frequent and cheap. Unfortunately the no.2 bus which services the site only runs every ½ hour between 07:45 and 18:45 and is relatively expensive at £4.10 return. The Park & Ride bus service which runs along much the same route is cheaper at £3.00 and more frequent, running every 15 minutes between 06:15 and 18:45. However, it doesn't stop frequently enough along Lansdown Road to adequately serve residents. The ticketing systems between the services are incompatible so that you can't for example use a return ticket covering both services. As a result if you mix the services on the same trip you have to pay twice.

A better solution for the Bath community would be to combine the services and have a single service running three buses continuously up and down Lansdown Road, with frequent stops including one alongside the Ensleigh site. The service should also be provided at the same low cost (£3) available to Park & Ride customers or ideally should be subsidised down to £2 return which would encourage significantly greater take-up of the service by residents.

There also needs to be provision for a less frequent late bus running through to 23:00.

Cycling provision: While the provision of a cycle lane up Lansdown Hill is welcomed we would point out that the hill is very steep and is likely only to see use by the super-fit or those with electric bicycles. An alternative less steep route would help. Because of the steepness of the hill good provision for electric bikes should be made and mains electrical connections should be included on cycle storage facilities which we presume will be included with homes built to Codes 5 & 6.

²¹ <http://www.transitionbath.org/food>

MOD not releasing all the land making the layout of the estate difficult: as far as we understand the MOD may not be releasing a substantial part of the Ensleigh site until 2018. This land is occupied by a data centre at the centre of the site. If the MOD does not release this land promptly we are concerned that this may lead to serious compromises in the design and layout of the site as well as place the delivery date of the entire scheme in doubt.

7.2 Foxhill

Foxhill is the largest site while probably having the best existing local infrastructure with provision of public transport, local shopping and schools. Our comments on the Foxhill proposals are:

Primary School provision: This needs to be thought about carefully as Combe Down School is very close by, but has a very small site with limited opportunities for expansion and very poor and unsustainable existing fabric²². Rather than splitting the school campus between a new school at Foxhill and the existing site it might be better to build a single larger more sustainable (BREEAM 'Excellent') school at Foxhill in exchange for council owned land being made available for housing on the Combe Down School site.

No provision for cycle lanes: The background document on transport provision at Foxhill states "*The specific provision of cycle lanes along Bradford Road as part of any scheme has been considered but is not considered desirable*" it explains that this is not possible because of parking provision on Bradford Road. We would suggest the council consider looking at the options for provision of a cycling lane on Bradford Road again as only a short section of the road provides parking bays and the road may indeed be wide enough to support cycle lanes.

Cycling and Walking Routes: We welcome the idea of walking and cycling routes into the town centre via Perrymead, Prior Close and Popes Walk. Careful thought will be needed in their detailed design.

7.3 Warminster Road

Warminster Road is the smallest of the sites, is within walking distance of the centre of town and is visually sensitive.

Our specific comments on Warminster Road are:

Visual Impact: the Warminster Road site is visible from much of the northern side of Bath and as such will have a much more visible impact on the cityscape of the Bath World Heritage site than the other sites. We support the view that the proposed tiered north-south orientation would allow all residents good views across the valley. This would have the additional benefit of providing south facing roof spaces for solar PV and solar thermal panels which would not be visible from across the valley. It may be possible to achieve Code 6 housing for Warminster Road.

²² "Combe Down School Energy Assessment", Lock-In Energy, May 2010



School provision: There is currently no additional school provision proposed for Warminster Road. The local schools Bathwick St Marys and Widcombe Infants are the most popular and oversubscribed (by a factor of almost three²³) schools in Bath. The likely consequence, if no additional provision is made is that primary school children would have to travel even further than they have to do today to get to school, increasing pollution and congestion in the local area. As part of the evidence base for this scheme we would be grateful if the council could explain how provision for primary school children will be achieved?

Paul Stansall, Philip Haile, Virginia Williamson & Dick Daniel, plus others on behalf of Transition Bath

²³ [Bathwick St Marys – 84 applications for 30 places, Widcombe Infants – 150 applications for 60 places](#)